



U.S. Department of Justice

United States Attorney  
Eastern District of New York

JHK:DCL:MMO

610 Federal Plaza  
Central Islip, New York 11722

March 14, 2019

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ **MAR 21 2019** ★

LONG ISLAND OFFICE

Honorable Joseph F. Bianco  
United States District Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: United States v. Kenner and Constantine  
No. CR-13-607 (S-2) (JFB)

Dear Judge Bianco:

This letter is submitted to advise the Court that, pursuant to the Court's directive on March 1, 2019, the government met with counsel for the third parties on March 13, 2019 to address their concerns regarding certain language in the proposed preliminary order of forfeiture.

At the conclusion of the meeting, the government and counsel agreed that additional time is necessary to continue the discussion. Accordingly, the government respectfully requests permission to file a letter on or before April 5, 2019, to advise the Court of the progress of its discussions with third party counsel.

*Request granted*

**ORDERED**

Joseph F. Bianco

Joseph F. Bianco  
USDJ

Date: March 21 2019  
Central Islip, N.Y.

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Madeline O'Connor  
Madeline O'Connor  
Diane C. Leonardo  
Assistant U.S. Attorneys  
(631) 715-7870  
(631) 715-7854

cc: Sam Talkin, Esq. (by ECF)  
Jesse Siegel, Esq. (by ECF)  
Philip Kenner (by mail)  
Thomas McC. Souther, Esq. (by email)  
Kevin P. Mulry, Esq. (by email)  
Marc Wolinsky, Esq. (by email)  
Doreen Martin, Esq. (by email)  
Kelly Weiner, Esq. (by email)  
George Kostolampros, Esq. (by email)